

Ning Ye, Esq.
135-11 38th Avenue, Suite 1A
Flushing, NY 11354
Tel.: 718-308-6626;
Fax: 718-228-5816
Email: ynyale@aol.com

**THE U.S.DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
NEW YORK**

)	
Hai Dong Li)	File Number: 19-cv-11629
Plaintiff)	Motion for Enlargement of Time
Alibaba Group Holding Ltd., et al)	
Defendants)	

MOTION FOR ENLARGEMENT OF TIME

COMES NOW Plaintiffs, by and through this undersigned counsel,
Ning Ye, Esq., to respectfully move that this Honorable Court for an
Enlargement of Time to file Opposition Brief until after the peak of this
Covid19 Pandemic has passed by the end of this April.

Here in this case, the sizable counsels team for this global
multibillion E-Commerce conglomerate, an integral part of the ruling
bloc of totalitarian China, has thrown out a stock pile of motions and
other Pleading papers during the stormy season of business closures for
quarantine and social distancing session at the center of this national or
world epi-center as of New York. The undersigned is a solo practitioner
and who is in self-therapy, self-recovering process to fight against Flu
like syndrome in home and bed confinement under quarantine. More
horrifying incident is that his litigation database was recently attacked by

another kind of virus, also highly likely from Beijing, the ultimate source of different kinds of virus, and place of origin of Defendant Alibaba. It is not pragmatic for this undersigned to invite a technician to his quarantined place to have his database fixed for health concerns during this period of business closures and social distancing.

Under these circumstances of *Force Majeure*, Plaintiff humbly prays that this Honorable Court extend the deadline for Plaintiff to submit all responsive briefs on or before May 4th, 2020.

Finally, this undersigned humbly proposes that a slight extension of the deadline to submit responsive briefs may highly unlikely interpose any prejudice or detriments upon any party, this undersigned therefore respectfully pray that this Motion for a streamlined extension of time be favorably adjudicated and granted.

Wherefore, in the foregoing light, the undersigned humbly prays that his Motion for Enlargement of Time be favorably adjudicated and granted.

Respectfully submitted by,

/s/Ning Ye, Esq.
Counsel for the Plaintiff

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ORDER (draft)

This Court, having considered the Plaintiffs' Motion for Enlargement of Time on this case, and having determined that good cause exists to grant this motion. Appellant must file with this Court his Responsive Briefs to Defendants' Motion to Dismiss and other Motions on or before 4th day of May, 2020; Defendants must file their Reply, if any, on or before 18th day of May, 2020. Sur-Replies, if any, must be filed with this Court no later than 29st day _____day of May, 2020. It is so ordered this _____ day of _____, 2020

It is so ORDERED.

The Hon. Court:

CERTIFICATE OF SERVICE

The undersigned certifies that on this 8th day of April, 2020, he caused to be served upon Stephen P. Blake, Esq., Jonathan S. Kaplan, Esq., Stephanie L. Hon., Esq. Defense counsels for all Defendants, a copy of the within captioned Motion via this Court's ECF Broadcasting system, into which, these counsels have ready access:

425 Lexington Avenue
New York, New York, 10017
Telephone: (212) 455-2000
Facsimile: (212) 455-2002

/s/Ning Ye
Ning Ye, Esq. Counsel for the Plaintiffs